

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

JACQUELINE LASSITER,

Plaintiff,

v.

KIMBER ANDERSON, BRIAN GIBBS,  
FLEET BANK

Defendants.

Civil Action No. 04-cv-10550-WGY

**AFFIDAVIT OF ELIZABETH A. PRYOR**

ELIZABETH A. PRYOR, being duly sworn, deposes and says:

1. I am over the age of eighteen (18) and I make this affidavit based upon my knowledge of the facts of this case, and my review of the records of Defendant Fleet National Bank, incorrectly identified by Plaintiff in her Complaint as "Fleet Bank" ("Fleet" or "Defendant").

2. I have been employed by Fleet or its predecessors for 1 year. I am currently Vice President and Assistant Secretary.

3. Fleet National Bank is a nationally chartered banking/financial institution.

4. FleetBoston Financial Corporation, once a publicly traded company and the sole shareholder of Fleet National Bank, has been merged out of existence through its merger with Bank of America Corporation.

5. Bank of America Corporation, a publicly traded company, now owns 100% of the outstanding shares of stock of Fleet National Bank.

6. Neither Bank of America Corporation nor Fleet National Bank is a public employer in the sense they are not a federal, state or municipal governmental agency or entity.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 30th DAY OF NOVEMBER 2004.

/s/ Elizabeth A. Pryor  
ELIZABETH A. PRYOR